

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE**  
Nashville Division

JOHNNY M. HUNT

Case No. 3:23-cv-00243

v.

SOUTHERN BAPTIST CONVENTION;  
GUIDEPOST SOLUTIONS LLC; and  
EXECUTIVE COMMITTEE OF THE  
SOUTHERN BAPTIST CONVENTION

Judge Eli J. Richardson

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Rule 83.01 of the Local Rules of Court for the United States District Court Middle District of Tennessee, Patrick J. Sanders hereby moves for admission to appear *pro hac vice* in the above-captioned action as counsel for Plaintiff, Johnny M. Hunt.

Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct:

1. I am a member in good standing of the United States District Court for the Southern District of Indiana. Attached is a Certificate of Good Standing from that court.

2. I am not, nor have I ever been, the subject of disciplinary proceedings by any disciplinary authority, court, or tribunal, except as provided below:

N/A

3. I have not been found in contempt by any court or tribunal, except as provided below:

N/A

4. I have not been sanctioned pursuant to 28 U.S.C. § 1927, except as provided below:

N/A

5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court or tribunal, except as provided below.

N/A

6. I have not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below:

N/A

7. I understand that pursuant to Local Rule 83.01(d)(1), if I am not both a member of the Tennessee bar and admitted to the bar of this Court, local counsel must be retained. Below is the name, address, phone number, and e-mail address of local counsel retained in this matter:

Todd G. Cole and Andrew Goldstein  
Cole Law Group, P.C.  
1648 Westgate Circle, Suite 301, Brentwood, TN 37027  
615-490-6020; tcole@colelawgrouppe.com;  
agoldstein@colelawgrouppe.com

8. I have read and am familiar with Local Rules of Court for the United States District Court Middle District of Tennessee.

9. By seeking admission to practice before this Court, I acknowledge my responsibility for compliance with all rules of this Court and confer disciplinary jurisdiction upon this Court for any alleged misconduct arising in the course of the proceeding.

/s/ Patrick J. Sanders Signature

Name: Patrick J. Sanders

State where admitted and State Bar Number: Indiana, Bar Number 36950-29

Business Address: MacGill PC, 156 E. Market Street, Suite 1200, Indianapolis, IN 46204

Local Address [if different from above]:

Phone: 317-961-5390

Email: patrick.sanders@macgilllaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing MOTION FOR ADMISSION PRO HAC VICE was filed electronically and sent to attorneys representing the below.

Southern Baptist Convention  
901 Commerce Street, Suite 750  
Nashville, TN 37203-3600

Guidepost Solutions LLC  
28 Liberty Street  
New York, NY 10005

Executive Committee of the Southern Baptist Convention  
901 Commerce Street, Suite 750  
Nashville, TN 37203-3600

/s/ Andrew Goldstein  
Andrew Goldstein